

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

VICTOR ELIAS PHOTOGRAPHY, LLC,  
An Oregon Limited Liability Company,

Plaintiff,

v.

MARRIOTT INTERNATIONAL, INC.,  
LEONARDO WORLDWIDE  
CORPORATION, A Canadian  
Corporation, ICE PORTAL, A Florida  
Corporation, and JOHN DOE,

Defendants.

C.A. NO. 4:18-cv-02142

JURY DEMANDED

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S  
AMENDED COMPLAINT**

Defendants Marriott International, Inc., Leonardo Worldwide Corporation and ICE Portal hereby move to dismiss Victor Elias Photography, LLC's Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2) for lack of personal jurisdiction. The reasons for the motion are set forth in the attached Memorandum of Law, which is incorporated by reference herein.

Dated: November 19, 2018

Respectfully submitted,

DUANE MORRIS LLP

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